

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

LANDWORKS CREATIONS, LLC.)	C.A. NO.05-CV-40072 FDS
)	
Plaintiff)	
)	
v.)	
)	
UNITED STATES FIDELITY AND GUARANTY)	
COMPANY and)	
LOVETT-SILVERMAN CONSTRUCTION)	
CONSULTANTS, INC.)	
)	
Defendants)	
)	

**DEFENDANT LOVETT-SILVERMAN CONSTRUCTION CONSULTANTS,
INC.'S MOTION FOR ADMISSION OF MARIANNE BROWN, PRO HAC VICE**

NOW COMES the defendant, Lovett-Silverman Construction Consultants, Inc. ("Lovett-Silverman") by and through its counsel, Donovan Hatem LLP, and respectfully moves for special admission of Marianne Brown, Esquire, of Donovan Hatem LLP, pro hac vice, for the purpose of representing Lovett-Silverman in the above-captioned action. In support of this motion, Lovett-Silverman states as follows:

1. Marianne Brown, Esquire, is a partner in the law firm of Donovan Hatem, LLP and has been a member in good standing of the bars of the State of New Jersey since 1986 and the Commonwealth of Pennsylvania since 1987. Ms. Brown is also a member in good standing of the bars of the United States Supreme Court, the Third Circuit Court of Appeals, the Second Circuit Court of Appeals, the District Court of New Jersey, the Southern District of New York and the Eastern and Western Districts of Pennsylvania.

2. Ms. Brown is not currently suspended or disbarred in any jurisdiction.

3. There are no pending disciplinary actions against Ms. Brown.

7. Ms. Brown is familiar with the facts and circumstances underlying the claims at issue in the above-captioned action.

8. David J. Hatem, PC, of Donovan Hatem LLP, is a member in good standing in the District of Massachusetts since 1977 and will assist Ms. Brown during the trial and with all pretrial matters.

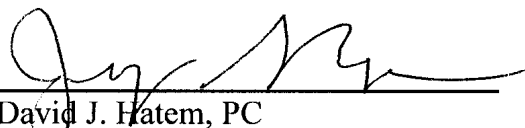
9. No memorandum of law is submitted with this motion because this motion is addressed to the Court's discretion.

10. Pursuant to Local Rule 7.1(a)(2), concurrence for this motion was sought and obtained by all counsel of record.

WHEREFORE, the Defendant, Lovett-Silverman Construction Consultants Inc., respectfully requests that this Court grant this motion to admit Marianne Brown, pro hac vice, in the above-captioned action.

Respectfully submitted,
LOVETT-SILVERMAN
CONSTRUCTION CONSULTANTS, INC.,

By its attorneys,

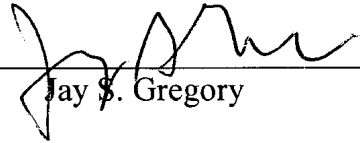


David J. Hatem, PC
BBO # 225700
Jay S. Gregory
BBO # 546708
DONOVAN HATEM LLP
Two Seaport Boulevard
Boston, MA 02210
Tel: (617) 406-4500

Dated: September 22, 2006
01034760

LOCAL RULE 7.1(a)(2) CERTIFICATE

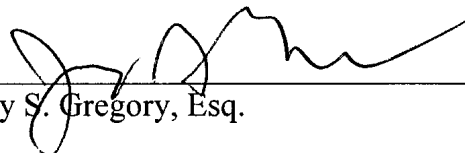
I, Jay S. Gregory, hereby certify that pursuant to Local Rule of the United States District Court for the District of Massachusetts 7.1(a)(2), counsel have conferred in good faith concerning this motion.


Jay S. Gregory

CERTIFICATE OF SERVICE

I, Jay S. Gregory, Esq., hereby certify that on this 21 day of September, 2006, I served a copy of the foregoing ***Defendant Lovett-Silverman Construction Consultants, Inc.'s Motion For Admission Of Marianne Brown, Pro Hac Vice*** by mailing, postage prepaid, to:

Robert N. Meltzer, Esq. P.O. Box 1459 Framingham, MA 01701	Eric C. Hipp, Esq. Hermes, Netburn, O'Connor & Spearing 265 Franklin Street, 7 th Floor Boston, MA 02109
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Jay S. Gregory, Esq.

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CONSULTANTS, INC.)	
)	
Defendants)	
)	

AFFIDAVIT OF MARIANNE E. BROWN FOR ADMISSION *PRO HAC VICE*

Marianne E. Brown hereby applies for admission *pro hac vice* to represent the defendant, Lovett-Silverman Construction Consultants, Inc., and in accordance with Local Rule 83.5.3(b), states the following:

1. I am a partner in the law firm Donovan Hatem LLP, Two Seaport Lane, Boston, Massachusetts, 02210.
2. I have been a member in good standing of the Bars of the State of New Jersey since 1986 and the Commonwealth of Pennsylvania since 1987. I am also a member in good standing of the Bars of the United States Supreme Court, the Third Circuit Court of Appeals, the Second Circuit Court of Appeals, the District Court of New Jersey, the Southern District of New York and the Eastern and Western Districts of Pennsylvania.
3. I am not currently suspended or disbarred in any jurisdiction and there are no disciplinary actions pending against me.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

5. David J. Hatem, PC, of Donovan Hatem LLP, is a member in good standing in the District of Massachusetts since 1977 and will assist me during the trial and with all pretrial matters.

Signed under the penalties of perjury this 12 day of October, 2006.

A handwritten signature in black ink, appearing to read "Marianne E. Brown", is written over a horizontal line.

Marianne E. Brown, Esq.
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(617) 406-4500

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